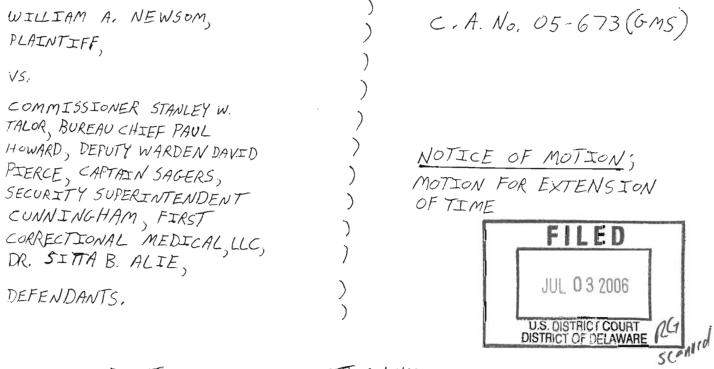
'WILLIAM A. NEWSOM S.B. I. # 257317 DELAWARE CORRECTIONAL CENTER '181 PADDOCK ROAD SMYRNA, DELAWARE 19977

## UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE



## TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT ON JUNE 30, 2006, PLAINTIFF WILLIAM A. NEWSOM NOW BRINGS THIS MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS ANSWER TO COMPLAINT / MOTION TO DISMISS DATED JUNE 26, 2006 BY DEPUTY ATTORNEY GENERAL FILEEN KELLY AND JUNE 27, 2006 BY DANIEL MCKENTY, ESQ AND DANA SPRING MONZO, ESQ. ATTORNEYS FOR FIRST CORRECTIONAL MEDICAL, LLC. PLAINTIFF WILL MOVE THE COURT TO GRANT AN EXTENSION OF TIME TO RESPOND TO THE MOTIONS ON OR BEFORE AUGUST 18, 2006. PLAINTIFF MAKES THIS REQUEST DUE TO LIMITED TIME AVAILABLE TO HIM AT THE PRISON LAW LIBRARY, AS WELL AS THE FACT THAT THE PLAINTIFF HAS TO RESPOND TO (2) SEPERATE MOTIONS TO DISMISS FILED BY (2) DIFFERENT SETS OF COUNSEL

FOR THE DEFENDANTS.

THIS MOTION IS BASED ON ALL PAPERS FILED AND RECORDS IN THIS ACTION TO DATE.

DATED: JUNE 30, 2006
WILLIAM A. NEWSOM, PLAINTIFF

## MOTION REQUESTING EXTENSION OF TIME TO RESPOND TO DEFENDANT'S ANSWER TO COMPLAINT / MOTION TO DISMISS

PLAINTIFF RESECT FULLY REQUESTS, PURSUENT TO FED. R. CIV. P. 6(b), AN ORDER GRANTING AN EXTENSION OF TIME TO RESPOND TO DEFENDANTS ANSWER TO COMPLAINT/ MOTION TO DISMISS, TO AUGUST 18, 2006.

THIS MOTION IS MADE ON THE GROUNDS THAT:

- 1) PLAINTIFF RECEIVED SERVICE OF STATE DEFENDANT'S ANSWER TO COMPLAINT / MOTION TO DISMISS DATED TUNE 26, 2006, ON JUNE 27, 2006, WITH A LONG COMPLICATED LIST OF AFFIRMATIVE DEFENSES THAT THE PLAINTIFF MUST RESEARCH DUE TO HIS LIMITED LEGAL KNOWLEDGE.
- 2) PLAINTIFF RECEIVED SERVICE OF DEFENDANT'S FIRST
  CORRECTIONAL MEDICAL, U.C. ANSWER TO COMPLAINT/
  MOTION TO DISMISS DATED JUNE 27, 2006, ON JUNE
  28, 2006, WITTH A LONG COMPLICATED LIST OF
  AFFIRMATIVE DEFENSES THAT THE PLAINTIFF MUST
  RESEARCH DUE TO HIS LIMITED LEGAL KNOWLEDGE.
- 3) PLAINTIFF, WHO IS REPRESENTING HIMSELF ON A PRO SE BASIS, IS ALLOWED ACCESS TO THE PRISON LAW LIBRARY ONLY SIX HOURS PER WEEK WHICH PREVENTS HIM FROM COMPLETENG THE NECCESSARY LEGAL RESEARCH REQUIRED TO PROPERLY RESPOND TO DEFENDANT'S MOTION.

4) PLAINTIFF HAS REQUESTED NO PREVIOUS EXTENSIONS OF TIME IN THIS MATTER AND TO DATE, ALL OF HIS FILINGS WITH THE COURT HAVE BEEN MADE IN A TIMELY MANNER.

RESPECTFULLY SUBMITTED THIS 30TH DAY OF JUNE, 2006,

BY: William Q. Newson

WILLIAM A. NEWSOM 5,B,I, #2573/7 DELAWARE CORRECTIONAL CENTER 1181 PADDOCK ROAD SMYRNA, DELAWARE 19977

## CERTIFICATE OF SERVICE

T, WILLIAM A. NEWSOM, HEREBY CERTIFY UNDER
PENALTY OF PERJURY THAT A TRUE AND CORRECT COPY
OF THE NOTICE OF MOTION AND MOTION FOR EXTENSION
OF TIME HAS BEEN PROVIDED TO THE BELOW LISTED
PARTIES, BY PLACING SAID MOTION IN A POSTAGE PAID
ENVELOPE AND MAILING SAID ENVELOPE VIA UNITED
STATES MAIL THIS 30TH DAY OF JUNE, 2006 TO DANIEL
MCKENTY, ESQ. AND DANA SPRING MONZO, ESQ. ATTORNEY
OF RECORD FOR DEFENDANT FIRST CORRECTIONAL MEDICAL,
LLC., AS WELL AS TO EILEFNIKELLY, ESQ. ATTORNEY OF
RECORD FOR STATE DEFENDANT'S.

William a. Newson

DATE 30TH 2006

WILLIAM A. NEWSOM
5.B.I. # 257317
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
5MYRNA, DELAWARE
19977

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

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